

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**In re: MICHAEL LUMB**

**Chapter 13**

**Debtor Bankruptcy No. 21-13216-MDC**

\* \* \* \* \*

**NOTICE OF MOTION, RESPONSE, DEADLINE AND HEARING DATE**

Finance of America Mortgage LLC f/k/a Finance of America Commercial LLC (“Creditor”) has filed a Motion to Dismiss Bankruptcy Pursuant to Section 1307 (c) of the Bankruptcy Code with the court for the purpose of dismissing this Chapter 13 bankruptcy case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

**1. If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then on or before **March 10, 2023**, you or your attorney must do all of the following:**

(a) file an answer explaining your position at:

U.S. Bankruptcy Court  
900 Market St., Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk’s office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant’s attorney:

John J. Berry  
Dinsmore & Shohl LLP  
1300 Six PPG Place  
Pittsburgh, PA 15222  
412.281.5000 (t)  
412.281.5055 (f)  
Email: John.Berry@dinsmore.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. **A hearing on the Motion** is scheduled to be held on **March 14, 2023 at 12:30 PM in Courtroom #2 at U.S. Bankruptcy Court, Philadelphia 900 Market St.** Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office(s) in Philadelphia at 215-408-2800 to find out whether the hearing has been canceled because no one filed a response.

Date: 1/26/23